

UNITED STATES DISTRICT COURT
THIRD DIVISION
DISTRICT OF MINNESOTA

Cedric M. Wilson,

Our File No. _____

Plaintiff,

v.

NOTICE FOR REMOVAL

Walgreen Co. an Illinois Corporation
authorized to do business in Minnesota
d/b/a Walgreens and d/b/a Walgreens-
Store #6447,

Defendant.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT
OF MINNESOTA:

Petitioners\Defendants respectfully show and allege the following in support of
their Petition for Removal.

1. Petitioners are the Defendants in an action commenced against them in
Hennepin County District Court entitled Cedric M. Wilson v. Walgreen Co. an Illinois
Corporation authorized to do business in Minnesota d/b/a Walgreens and d/b/a
Walgreens-Store #6447. A true and correct copy of the Summons and Complaint served
upon petitioners is attached as Exhibit "A". No further proceedings have taken place in
the state action.

2. Plaintiff, Cedric M. Wilson, is and was at all relevant times a citizen who resides
in the County of Ramsey and State of Minnesota. Petitioner\Defendant Walgreen Co. is

and at all relevant times a citizen and incorporated in the State of Illinois with its principal place of business in City of Deerfield in the State of Illinois.

3. Complete diversity exists among the parties to this action and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332, and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

5. The Summons and Complaint in the state action was served on Defendant on or about September 18, 2020, and Petitioner\Defendant has filed this Notice to Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioner\Defendant prays that the state action pending against them be removed to this Court.

Dated: September 29, 2020.

Lind, Jensen, Sullivan & Peterson
A Professional Association

s/Brian A. Wood

By _____
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